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**BY ECF**

Hon. Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

April 22, 2020

**Re: *King v. Wang et. al.* No. 14-cv-07694 (LJL-JLC)**

Dear Judge Liman,

We write on behalf of Yien-Koo King (“Yien-Koo” or Plaintiff”) to request an extension of one week for (a) the parties to submit reply memoranda in relation to their competing motions for summary judgment [ECF Dkt. 193 & 194] and (b) the Plaintiff to submit papers in opposition to the Defendants’ cross-motion to strike her Rule 56 Statement of Undisputed Material Facts [ECF Dkt. 215]. The above-noted filings are currently due Monday, April 27<sup>th</sup> and we respectfully request that deadline be extended to Monday, May 4<sup>th</sup>. The Defendants consent to this application.

Good cause exists to grant the extension. First, when the Plaintiff consented to the Defendants’ previous extension requests [*see* ECF Dkt. 205 & 207], the Defendants had not disclosed that they would be filing a cross-motion to strike. Had the Plaintiff known an additional motion was forthcoming, she would have accounted for it when agreeing to the Defendants’ revised briefing schedules. Second, and even more crucially, Sam Israel has recently been diagnosed with COVID-19. Though he is not currently being hospitalized, his condition is serious and has hindered our firm’s ability to prepare responses by the current April 27<sup>th</sup> deadline.

We thank Your Honor for the Court’s attention to this matter

Respectfully submitted:

**SAM P. ISRAEL, P. C.**

By: /s/Timothy Savitsky  
Timothy Savitsky (TS 6683)

cc. All counsel of record [*via* ECF]